

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Cancellation of the)
Certificate of Service Authority and) File No. CD-2015-
Tariff of Giant Communications, Inc.)

**MOTION TO CANCEL CERTIFICATE OF
SERVICE AUTHORITY**

COMES NOW the Staff of the Missouri Public Service Commission and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of interexchange service authority in Missouri of Giant Communications, Inc. ("the Company") and states as follows:

1. On July 6, 2013, the Commission granted a certificate of basic local exchange telecommunications service authority to the Company in Case No. CA-2013-0492.

2. On June 8, 2015, the Company notified the Commission that it no longer wished to retain its certification to provide telecommunications services in Missouri (see attached letter).

3. The Commission has the authority to cancel a telecommunications certificate pursuant to Section 392.410.5 RSMo 2000, which provides "[a]ny certificate of service authority may be altered or modified by the commission after notice and hearing, upon its own motion or upon application of the person or company affected."

4. The Commission need not hold a hearing, if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989).

WHEREFORE, the Staff respectfully recommends the Commission cancel the certificate of service authority to provide basic local exchange telecommunications service in Missouri of Giant Communications, Inc.

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of June, 2015.



LATHROP & GAGE_{LLP}

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June 8, 2015

VIA E-MAIL: cully.dale@psc.mo.gov
AND U.S. MAIL

Colleen M. Dale
Senior Counsel
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: In the Matter of Giant Communications, Inc. : Certificate of Service,
Authority to Provide Interchange and Non-Switched Local Exchange
Telecommunications Service in the State of Missouri: File No. CA-2013-
0492

Dear Ms. Dale:

The undersigned filed for authority of Giant Communications, Inc. to provide telecommunication services in the State of Missouri in 2013, which was appropriately processed and approved. The undersigned has continued to serve as counsel and agent for Giant Communications, Inc. since that time.

I have been authorized and directed by appropriate executives and officials of Giant Communications, Inc. to request that the approval of such service in the State of Missouri be discontinued. Giant Communications has not provided telecommunication service in the State of Missouri since granted its authority to do so and does not foresee in the future that it will do so. Continuing to comply with the rules and regulations of the Missouri Public Service Commission is deemed unnecessary. Therefore, it is requested that the appropriate steps be taken to obtain an Order of the Missouri Public Service Commission indicating that Giant communications, Inc. desires to withdraw and forfeit its authority to institute or continue business in Missouri and approving such.

Thank you for your discussion with me as to appropriate steps to take and please advise if we need to furnish additional information or authority. Kansas counsel for

Colleen M. Dale
June 8, 2015
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Giant Telecommunications, Inc. and an appropriate officer of said company are being copied herewith, having directed the undersigned to take the appropriate steps.

Thank you for your courteous assistance in communicating with me.

Very truly yours,

LATHROP & GAGE LLP

By: 
W.H. Bates

cc: (via e-mail and U.S. mail:)
Mr. James M. Caplinger jim@caplinger.net
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Topeka, KS 66612

Mr. Roger Del Fiacco Roger@jbntelco.com
Controller
Giant Communications, Inc.
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